

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

ESTATE OF TYRESE WEST,	)	
Deceased, by MONIQUE WEST and	)	
DWIGHT PERSON, as	)	
Special Administrators,	)	
	)	Case No. 19-CV-1843
Plaintiffs,	)	
	)	Judge Brett Ludwig
v.	)	
	)	
INV. ERIC GIESE and	)	
VILLAGE OF MT. PLEASANT,	)	
A Municipal Corporation,	)	
	)	
Defendants.	)	

---

**UNOPPOSED MOTION FOR ADDITIONAL TIME TO RESPOND TO  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

NOW COMES, the Plaintiff, Estate of Tyrese West, through its administrators, Monique West and Dwight Person, by and through their attorneys, and Defendants, Sgt. Eric Giese and the Village of Mount Pleasant, by and through their attorneys, to respectfully move this Honorable Court to extend the deadline for Plaintiff to respond to Defendants' Motion for Summary Judgment, and in support state as follows:

1. On September 2, 2021, the court granted the parties' Joint Motion for Extension of Time for fact discovery, expert discovery, and dispositive motions, resetting the deadline for dispositive motions to February 15, 2022. (Dkt. at 43).
2. On February 15, 2022, Defendants filed a motion for summary judgment to dispose of Plaintiff's entire case. (Dkt. at 51).
3. Pursuant to Local Rule 56(b)(2), Plaintiffs must file their response on or before March 17, 2022.

4. Given the involved nature of Defendants' summary judgment motion, Plaintiff is seeking an additional 15 days to file its Response.

5. Plaintiff is not seeking this extension to cause an undue burden on any party or the court. Moreover, no parties will be unduly prejudiced by this extension.

6. On February 23, 2022, Plaintiff Monique West's counsel, Gianna Gizzi, and Defense Counsel, Benjamin Sparks, discussed Plaintiff's intention of filing this motion.

7. Defense Counsel indicated they have no objections to the requested relief.

8. Additionally, this matter has not yet been set for trial.

WHEREFORE, the Plaintiff, Estate of Tyrese West, through its administrators, Monique West and Dwight Person, respectfully request this Honorable Court to set the deadline for Plaintiff's Response to Defendants' Motion for Summary Judgment to April 1, 2022 , or any other amount of time the court deems appropriate.

Respectfully Submitted,



*One of Plaintiff's Attorneys*

**Gianna Gizzi, No. 6332727**  
**Gregory E. Kulis & Associates, Ltd.**  
**30 N. LaSalle Street, Suite 2140**  
**Chicago, IL 60602**  
**p: (312) 580-1830 / f: (312) 580-1839**  
**e: ggizzi@kulislawltd.com**